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RAYVIO CORP.

12
13 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 NITRIDE SEMICONDUCTORS CO., LTD.,
a Japanese corporation,

16 Plaintiff,

17 v.

18 RAYVIO CORPORATION, a Delaware
corporation,

19 Defendant.

20 CASE NO. 5:17-cv-02952-EJD-SVK

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**DECLARATION OF KATE E. HART IN
SUPPORT OF RAYVIO CORPORATION'S
MOTION TO STRIKE PORTIONS OF
PLAINTIFF'S TECHNICAL EXPERT DR.
FERGUSON'S EXPERT REPORT**

1 I, Kate E. Hart, declare as follows:

2 1. I am an attorney with the law firm Dentons US LLP, counsel of record for
3 Defendant RayVio Corporation (“RayVio”). I am a member in good standing with the State Bar
4 of California. I have personal knowledge of the facts set forth in this Declaration and, if called
5 as a witness, could and would testify competently thereto.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiff’s Disclosure of
7 Asserted Claims and Infringement Contentions, dated September 8, 2017.

8 3. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiff’s First
9 Amended Disclosure of Asserted Claims and Infringement Contentions, dated October 24, 2017.

10 4. Attached hereto as **Exhibit 3** is a true and correct copy of Exhibit A1 to Plaintiff’s
11 Disclosure of Asserted Claims and Infringement Contentions, dated September 8, 2017.

12 5. Attached hereto as **Exhibit 4** is a true and correct copy of Exhibit A2 to Plaintiff’s
13 Disclosure of Asserted Claims and Infringement Contentions, dated September 8, 2017.

14 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the
15 expert report of Ian Ferguson, dated August 15, 2018.

16 7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the
17 deposition transcript of Ian Ferguson, Ph.D., dated November 12, 2018.

18 8. Attached hereto as **Exhibit 7** is a true and correct copy of Ferguson deposition
19 Exhibit 2.

20 9. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the
21 Markman hearing transcript, dated April 19, 2018.

22 10. Attached hereto as **Exhibit 9** is a true and correct copy of U.S. Patent No.
23 6,861,270, Bates numbered NS00000001 - NS00000010.

24 11. Attached hereto as **Exhibit 10** is a true and correct copy of an e-mail and
25 attachments from Patricia Young to the Court, dated July 19, 2018.

26 12. Attached hereto as **Exhibit 11** is a true and correct copy of a document Bates
27 numbered NS00000814 - NS00000816.

28 13. Attached hereto as **Exhibit 12** is a true and correct copy of a document Bates

numbered NS00000821.

14. Attached hereto as **Exhibit 13** is a true and correct copy of Exhibit O to Plaintiff's First Amended Disclosure of Asserted Claims and Infringement Contentions, dated October 24, 2017.

5 15. Attached hereto as **Exhibit 14** is a true and correct copy of an e-mail between
6 Counsel dated September 13, 2017.

7 16. Attached hereto as **Exhibit 15** is a true and correct copy of an e-mail between
8 Counsel, dated September 13, 2017.

9 17. Attached hereto as **Exhibit 16** is a true and correct copy of an e-mail between
10 Counsel, dated September 15, 2017.

11 18. Attached hereto as **Exhibit 17** is a true and correct copy of e-mail between
12 Counsel, dated September 18, 2017.

13 19. Attached hereto as **Exhibit 18** is a true and correct copy of e-mail between
14 Counsel, dated October 4, 2017.

15 20. Attached hereto as **Exhibit 19** is a true and correct copy of e-mail between
16 Counsel, dated October 6, 2017.

17 21. Attached hereto as **Exhibit 20** is a true and correct copy of RayVio Corporations
18 First Set of Requests for Production to Plaintiff, dated October 11, 2017.

19 22. Attached hereto as **Exhibit 21** is a true and correct copy of letter between
20 Counsel, dated February 26, 2018.

21 23. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts from the
22 deposition transcript of Joshua Abell, Ph.D., dated July 3, 2018.

23 I declare under penalty of perjury that the foregoing is true and correct, and that I
24 executed this Declaration on December 3, 2018 in Kansas City, Missouri.

/s/ Kate E. Hart
Kate E. Hart